The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Deval L. Patrick
GOVERNOR

Timothy P. Murray
LIEUTENANT GOVERNOR

Ian A. Bowles
SECRETARY

Tel: (617) 626-1000
Fax: (617) 626-1181
http://www.mass.gov/envir

February 15, 2007

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS
ON THE
EXPANDED ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME:	Proposed Retail Development
PROJECT MUNICIPALITY:	Greenfield
PROJECT WATERSHED:	Deerfield and Connecticut
EOEA NUMBER:	13929
PROJECT PROPONENT:	Greenfield Investors Property Development, LLC
DATE NOTICED IN MONITOR:	December 23, 2006

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62H) and Section 11.03 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **requires** the preparation of an Environmental Impact Report (EIR).

Project Description

As described in the Expanded Environmental Notification Form (EENF), the project proposes the development of an approximately 160,000 square foot (sf) retail store with garden center in Greenfield, MA. The development parcel is part of a larger 29-acre site consisting of two lots divided by the recently abandoned Gill Road west of the intersection of Routes 2 and 2A. The 19-acre development parcel to the south of Gill Road (the "South Parcel") is largely disturbed due to past gravel operations and currently a construction/fuel supply operation. The approximately 10-acre parcel to the north (the "North Parcel") is undeveloped and consists largely of wetland resource areas.

Jurisdiction and Permitting

The project is undergoing MEPA review and requires the preparation of an EIR pursuant to Section 11.03(6)(a)(6) of the MEPA regulations because it will result in the generation of more than 3,000 new average daily vehicle trips (adt). The project also exceeds the following ENF review thresholds: Section 11.03(1)(b)(2) because the project will result in the creation of more than 5 acres of new impervious surface and Section 11.03(6)(b)(15) because the project requires the construction of more than 300 new parking spaces at a single location.

The project requires the following permits and/or review: a National Pollutant Discharge and Elimination System (NPDES) Construction General Permit from the U.S. Environmental Protection Agency (EPA); a Programmatic General Permit from the U.S. Army Corps of Engineers (ACOE); an Access Permit from the Massachusetts Highway Department (MHD); a Sewer Connection/Extension Permit and possibly a 401 Water Quality Certificate from the Department of Environmental Protection (MassDEP); an Order of Conditions from the Greenfield Conservation Commission; Major Development Review from the Greenfield Zoning Board of Appeals; and a Curb Cut Permit from the Greenfield Department of Public Works.

Because the proponent is not seeking financial assistance from the Commonwealth for the project, MEPA jurisdiction extends to those aspects of the project that may cause significant Damage to the Environment and that are within the subject matter of required or potentially required state permits. In this case, MEPA jurisdiction extends to land alteration, stormwater, transportation, wetlands, wastewater and historic resources.

Request for a Single EIR

In accordance with Section 11.05(7) of the MEPA regulations, the proponent has submitted an Expanded ENF with a request that I allow the proponent to fulfill its EIR obligations under MEPA with a Single EIR, rather than require the usual two-step Draft and Final EIR process. The Expanded ENF received an extended public comment period pursuant to Section 11.06(1) of the MEPA regulations. I have reviewed the proponent's request for a Single EIR in accordance with Section 11.06(8) of the MEPA regulations, and I hereby find that the Expanded ENF meets the regulatory standards. I will therefore allow the proponent to prepare a Single EIR in fulfillment of the requirements of Section 11.03 of the MEPA regulations.

I acknowledge the proponent's efforts in developing the EENF, which contained considerable information that has been particularly helpful in understanding the project and defining the scope for the EIR. While I am allowing the proponent to prepare a Single EIR, I note however the receipt of many thoughtful and technical comments on the EENF that must be addressed in detail in the Single EIR. I retain my authority to require further review in the form of a Supplemental Environmental Impact Report if issues outlined in this Scope and in comments are not thoroughly addressed in the Single EIR.

I would like to take this opportunity to emphasize that I do not have the authority to approve or deny this project. MEPA review is not a permitting process, nor does it serve as an

appeal for local decisions. It does not pass judgment on whether a project is or is not environmentally beneficial, or whether a project can or should receive a particular permit. Rather, the MEPA process requires public disclosure of a project's environmental impacts as well as the measures that the proponent will undertake to mitigate these impacts. MEPA review occurs before public agencies act to issue permits for a proposed project to ensure that they are fully cognizant of the environmental consequences of their actions.

SCOPE

General

As modified by this Certificate, the proponent should prepare the Single EIR in accordance with the general guidelines for outline and content found in Section 11.07 of the MEPA regulations. The Single EIR should include a copy of this Certificate and of each comment received, which should be addressed in the Single EIR as they are relevant to this Scope.

The proponent should circulate the Single EIR in accordance with Section 11.01(1) of the MEPA regulations; to those who commented on the EENF; to municipal officials in the City of Greenfield; and to any state and federal agencies from which the proponent will potentially seek permits or approvals. In addition, copies of the Single EIR should be made available at the Greenfield public library.

Permitting and Consistency

The Single EIR should include a brief description of each state permit or agency action required or potentially required, and should demonstrate that the project will meet applicable performance standards. The Single EIR should also discuss the consistency of project design with any applicable state policies. The proponent should provide an update on the local permitting process for the project.

In accordance with Executive Order No. 385, "Planning for Growth" and Section 11.03 (3)(a) of the MEPA regulations, the EENF discussed the consistency of the project with local and regional growth management and open space plans. The site lies within a "General Commercial" (GC) zoning district, which allows as-of-right retail and garden center uses. The project site is also located within the Corridor Overlay (CO) district as part of the French King Highway/High Street Corridor. The EENF also discussed the consistency of the project with the City of Greenfield Community Development Plan, the City of Greenfield Open Space and Recreation Plan, and the goals of the Franklin Regional Council of Governments (FRCOG).

Several commenters have raised concerns about the consistency of the project with the goals of the French King Highway/High Street Corridor zone. A Corridor Management Plan is

currently being prepared by the FRCOG for the Mohawk Trail East National Scenic Byway. The Single EIR should respond to specific comments on the project's impacts to the scenic landscape in this area. The proponent intends to raise the development site approximately 9 feet, which will bring the building roof level with the roadway overlook to the west. The Single EIR should include visual simulations of the proposed project from several perspectives to demonstrate that the project does not negatively impact the goals of various organizations and zoning tools that aim to protect a green entryway into Greenfield.

Alternatives

The EENF reported on several alternative development concepts that were considered by the proponent during the preliminary design process for the project. In addition to the No-Build Alternative and the Preferred Alternative, the proponent assessed two other alternatives featuring a mix of retail and restaurant space. Site Plan Alternative 1 would include approximately 184,000 sf of strip retail space and 6,700 sf of restaurant space in the eastern section of the North Parcel. Site Plan Alternative 2 would consist of approximately 124,000 sf of retail space with a supermarket and a 6,700 sf restaurant on the South Parcel. According to the EENF, no alternative land uses other than retail and/or restaurant uses were considered for the project site due to the development objectives set forth by the City and the proponent.

The proponent's Preferred Alternative involves the development of a 160,000 sf retail store with a garden center. According to the EENF, the proponent's Preferred Alternative locates new development within previously developed and/or previously altered areas where infrastructure exists, and contains the development outside the limits of the most environmentally and archaeologically sensitive areas. In the Single EIR, the proponent should examine measures that could be implemented to reduce the environmental impacts of the Preferred Alternative to ensure the state permitting agencies can make their Section 61 Findings that all feasible means to avoid, reduce, or mitigate environmental damage have been considered and incorporated into the project design.

In addition to the Preferred Alternative and No Build Alternative, the Single EIR should include a reduced build alternative that decreases the amount of impervious surface on site and minimizes impacts to wetland resource areas. The proponent proposes to construct approximately 604 surface parking spaces for the project. The Single EIR should explain how the number of parking spaces needed was determined. According to several comments on the EENF, the proposed parking supply is greater than the amount required under local zoning. The proponent should justify its need for such a large parking supply. The Single EIR should present an alternative that features a parking lot that meets the minimum requirement of Greenfield's zoning bylaw. Parking demand management should be a key component of the overall mitigation analysis.

The analysis does not necessarily require a reduction in the development's building program to be considered adequate, but it does require an analysis of alternative designs and techniques for minimizing the impacts associated with the project. The analysis should consider an increase in the floor area ratio (FAR), use of narrower roadways and reduction in impervious

surface associated with parking (e.g. including structured parking, reduction in the amount of parking, and/or phased construction of parking as warranted by demand), and use of permeable pavement. The Single EIR should fully explain any trade-offs inherent in the alternatives analysis, such as increased impacts on some resources to avoid impacts to other resources.

Land Alteration/Drainage

According to the EENF, the proponent will use a substantial amount of fill to raise the site elevation by approximately 9 feet. The Single EIR should provide more information on the earthwork and site grading needed to accomplish the desired elevation. The proponent should discuss the amount of fill that will be needed and should discuss where it will get the fill material. The proponent should ensure that fill material does not contain invasive species.

The project will result in the creation of 9.5 acres of new impervious surface. Currently no stormwater management facilities exist on the site. Under existing conditions, untreated stormwater runoff infiltrates through the ground or runs off to the wetland systems in the northern portion of the site. The EENF provided a discussion of existing drainage conditions at the site and modeled the impacts of the proposed project on stormwater volume and quality. According to the proponent's analysis, with the implementation of the proposed stormwater management system, there will be no increase n the peak discharge rates between the pre- and post-development conditions for all storm events.

The proposed development has been designed to direct stormwater runoff from the building rooftop to an above ground detention basin pond located in the northwestern portion of the site. Additional stormwater runoff from areas adjacent to the north, west and south sides of the building will be collected in a closed drainage system via catch basins with 4-foot deep sumps and hooded outlets and will be directed through a water quality unit and conveyed to the detention pond located in the northwestern portion of the site. Runoff from a large portion of the parking area on the east side of the proposed building will be collected by catch basins with deep sumps and hooded outlets and will be directed through a water quality unit and conveyed to an above ground detention pond located in the southeastern portion of the site. The remaining stormwater from the parking area located east of the building will be collected in catch basins and routed through water quality units and conveyed into an underground infiltration/detention system in the northern portion of the parking area and will discharge into the wetlands to the north. The Single EIR should respond to specific comments from the Franklin Regional Council of Governments regarding the structural Best Management Practices (BMPs) that are proposed.

The proponent states that the proposed stormwater management system will be designed in compliance with MassDEP's Stormwater Management Policy (SMP). The EENF provided a discussion of compliance with each of the applicable SMP standards. The proponent should show the location of the proposed garden center on project plans and discuss whether it will be enclosed. The proponent should discuss the storage of chemicals and pesticides and outline what precautions will be taken to ensure garden chemicals and fertilizers from entering the groundwater as runoff. The proponent should specifically address Standard #5 of the SMP which addresses stormwater discharges from areas with higher potential pollutant loads.

According to the EENF, a comprehensive source control program will be implemented at the site, which includes regular pavement sweeping, catch basin cleaning, and enclosure and maintenance of all dumpsters, compactors and loading areas. The EENF also includes an overview of Long Term Stormwater Operation and Maintenance Measures that will be incorporated into an Operations & Maintenance Plan to be reviewed by the Greenfield Conservation Commission during their review of the Notice of Intent. The Operations & Maintenance Plan should be included with the Single EIR. The Single EIR should elaborate on the ownership and maintenance of structural BMPs and should identify what entity will be responsible for non-structural BMPs.

Several commenters have noted that drainage from the project site will flow into wetlands that are the headwaters of two separate watersheds: the east branch of Cherry Rum Brook, which drains to the Green River and eventually the Deerfield River; and the Fall Brook which flows north and east into the Fall River, and then to the Connecticut River. In the Single EIR, the proponent should delineate and quantify the actual flow and drainage pattern going to each watershed. The proponent should respond to concerns that have been raised regarding the impact of project-related stormwater runoff on fishery resources in Cherry Rum Brook and Fall Brook, and Fall River and the Green River, both of which are designated as Cold Water Fisheries under 314 CMR 4.00.

I encourage the proponent to consider Low Impact Development (LID) techniques in site design and storm water management plans. LID techniques incorporate stormwater best management practices (BMPs) and can reduce impacts to land and water resources by conserving natural systems and hydrologic functions. The primary tools of LID are landscaping features and naturally vegetated areas, which encourage detention, infiltration and filtration of stormwater on-site. Other tools include water conservation and use of pervious surfaces. Clustering of buildings is an example of how LID can preserve open space and minimize land disturbance. LID can also protect natural resources by incorporating wetlands, stream buffers, and mature forests as project design features. For more information on LID, visit http://www.mass.gov/envir/lid/. Other LID resources include the national LID manual (Low Impact Development Design Strategies: An Integrated Design Approach), which can be found on the EPA website at: http://www.epa.gov/owow/nps/lid/. The Single EIR should include a discussion of any LID measures that the proponent could incorporate into project design.

Wetlands

The project site contains a number of federal, state and locally regulated wetland resource areas including bordering vegetated wetlands (BVW), Bank, Land Under Water Bodies and Waterways, and Riverfront Area. The most recent Flood Insurance Rate Map (FIRM) for the area indicates that most of the North Parcel lies within a Zone A, which is an area subject to flooding during the 100-year storm. The boundaries and jurisdictional status of wetlands on the site are currently under consideration by the Greenfield Conservation Commission as part of their review of a Request for Determination of Applicability that was filed in November of 2006. Therefore the information presented in the EENF regarding wetland impacts is preliminary and subject to

change based on the final decision of the Conservation Commission regarding each resource area's jurisdictional status.

The Single EIR should provide an update on the status of the site's wetland resource areas as determined by the Greenfield Conservation Commission. The Single EIR should identify and quantify each wetland resource area and buffer zone present on the site on a reasonably scaled plan. Riverfront Area to all perennial streams must be delineated on these plans. The Single EIR should also examine any floodplains associated with the site. If areas are determined to be classified as "subject to flooding" pursuant to the Wetland Protection Act, the proponent should quantify floodplain impacts and discuss whether compensatory storage will be required. MassDEP has indicated that a potential vernal pool is located just offsite. This resource area and its buffer zone as required by state and local regulations should be noted on plans.

The Single EIR should identify the significance of the resources, including value to public and private water supply, flood control, storm damage prevention, prevention of pollution, riverfront area, and wildlife habitat. The Single EIR should describe and quantify the extent of wetland alteration for the project and discuss whether impacts are temporary or permanent in nature. The proponent should explain how the project would comply with the performance standards in the wetlands regulations and demonstrate that the alteration of resource areas has been avoided and minimized. The proponent should discuss permitting of the project by the U.S. Army Corps of Engineers under Section 404 of the Clean Water Act.

According to the EENF, the project will result in impacts to approximately 1,500 sf of previously developed Riverfront Area. The proponent should provide more information on its plans to provide restoration to disturbed areas on site to provide mitigation for these Riverfront Area impacts.

According to the EENF, the project will result in the filling of Wetland 4, which is located in the floor of the former gravel pit in the South Parcel. It is the proponent's opinion that this wetland is not regulated under the Wetlands Protection Act or local wetlands bylaw. If, as a result of the Greenfield Conservation Commission's Determination of Applicability this wetland is classified as jurisdictional, the Single EIR should discuss any other required permits and/or mitigation. The Single EIR should identify proposed the wetland replication area if required, and detail plans for the construction and monitoring of any replication areas.

Wastewater

The project is anticipated to generate approximately 7,370 gallons per day (gpd) of wastewater. The proponent proposes to directionally drill a new sewer main under Route 2 to connect to the City-operated and maintained sewer system on the northern side of Route 2. The Single EIR should demonstrate that the proposed discharge of wastewater flows for the proposed project to the City of Greenfield's sewer system is feasible. At a minimum, the Single EIR should demonstrate that:

1. The City of Greenfield's sewer system has sufficient design capacity to accommodate the proposed project's additional wastewater flows; and
2. The proponent has secured permission from the City of Greenfield to treat the project's wastewater flows.

At the MEPA site visit held for the project said that the construction of new sewer main through the site will provide the City of Greenfield with the opportunity to connect the Canada Hill neighborhood and several businesses on the French King highway to the municipal sewer system. According to the proponent, flow from these areas will travel via gravity across the project site. Due to recent changes to the MassDEP wastewater regulations at 314 CMR 7.00 promulgated after the submission of the EENF, the project may now require a Sewer Extension/Connection permit. In response to comments from MassDEP on the EENF, the proponent should discuss whether the proposed main will be maintained privately by the site owner or turned over to the City, and the resulting permitting implications.

Transportation

The EENF includes a Traffic Impact and Access Study (TIAS) that was prepared in accordance with the Executive Office of Environmental Affairs (EOEA)/Executive Office of Transportation (EOT) guidelines. The traffic impact analysis and proposed mitigation were developed in coordination with the Massachusetts Highway Department (MHD) and local officials. The project is anticipated to generate approximately 9,220 new vehicle trips on a typical weekday, and approximately 12,420 vehicle trips on a typical Saturday. To provide for improved site access, Gill Road will be closed at its eastern intersection with Route 2A and will become the primary access/egress to the Site during construction. When the project is complete the general public will use a new full access signalized intersection on Route 2A. This intersection is proposed to be located southeast of the development approximately 300 feet west of the existing intersection of the abandoned Gill Road and Route 2A.

The traffic impact analysis submitted with the EENF quantified the existing and projected traffic conditions in the vicinity of the project and identified potential capacity and safety improvements that address existing deficiencies and mitigate for project-related traffic impacts. The study indicated that the signalized intersections in the study area operated at a Level of Service (LOS) D or better under 2011 No-Build and Build conditions. There is generally a decrease in LOS in the 2011 Build condition as compared to the 2011 No-Build condition. The analysis of unsignalized intersections in the study area indicates that under 2011 Build conditions, four intersections will operate at LOS F.

In the EENF, the proponent presented intersection and roadway improvement measures that will result in increased roadway capacity to mitigate the project's impacts on traffic. The proponent proposes intersection and roadway widening and/or traffic control improvements in the following areas:

- Turners Falls Road at 5th Street/Canal Avenue: Installation of an all-way stop sign and traffic markings.

- Wildwood Avenue at Route 5/10 (Federal Street): The proponent has presented two alternative transportation system management strategies at this intersection and is committed to continuing discussions with the City and FRCOG officials to further evaluate each alternative. The Single EIR should report on these discussions and present the improvement program for this location.
  Route 2A at Site Driveway: The proponent will install a fully-actuated traffic control signal at this location. In addition, the proponent construct a northbound exclusive left-turn lane and a southbound exclusive right-turn lane at the intersection.

EOT/MHD states in their comments on the EENF that the TIAS adequately analyzed the project's traffic and proposed adequate mitigation measures to address the impacts. I have however received numerous comments from organizations and citizens requesting clarification on issues raised in the TIAS and additional study and/or information on the project's impacts on state and local roadways. I strongly encourage the proponent to address these comments in detail in the Single EIR. The Single EIR should also address the impacts of the project on High Street, and on Adams Road/Lamplock Road.

Transportation Demand Management

The EENF also outlined proposed Transportation Demand Management (TDM) strategies that the proponent will encourage its tenants to implement to reduce vehicular traffic to and from the site. Measures outlined in the EENF include the promotion of ridesharing and the designation of preferential parking spaces for employees that carpool. The Single EIR should discuss whether the project is required to comply with the Massachusetts Rideshare Regulation (310 CMR 7.16). I note that TDM measures are generally less effective at retail developments than at office developments. With this in mind, the proponent should focus its efforts on providing effective pedestrian, bicycle and public transit connections to the development so that users have a variety of transit options. The proponent should also consider specific TDM measures as outlined by MassDEP in their comments on the EENF. The proponent should provide a clear commitment to implement and continuously fund any evaluated TDM measures deemed feasible to sustain and/or increase mode usage over time to ensure a balanced and functional transportation system along the corridor.

As part of the TDM program, bus stops are proposed at the intersection of the site drive and French King Highway. The proponent should explore the possibility of bringing transit service into the proposed development. The proponent will also coordinate with the tenant to encourage subsidized tickets for employees using public transportation. The proponent should explore providing pedestrian links to the site. Sidewalk connections should be provided to the Canada Hill neighborhood and along the length of the site frontage. The proponent should consider providing a sidewalk connection along the length of Route 2A to the existing sidewalk at Loomis Road, or should work with the City of Greenfield to convert Gill Road into a shared Bicycle/Pedestrian route to this project. The proponent should discuss what measures and improvements will be implemented to accommodate bicycle access to the site.

Air Quality

The projected vehicle trips from the project triggered MassDEP's requirement that the proponent conduct an air quality mesoscale analysis to determine if the proposed project will increase the amount of volatile organic compounds (VOCs) and nitrogen oxides (NOx) in the project area and to assess the project's consistency with the Massachusetts State Implementation Plan (SIP). The results of the mesoscale analysis and a summary discussion were submitted with the EENF. The analysis found that VOCs and NOx will increase by 54.3 kilograms per day (kg/day) and 105.3 kg/day, respectively. To mitigate these emissions, the proponent has agreed to implement several transportation demand management (TDM) incentives to reduce vehicle trips to the project site. Given that the proposed TDM measures are estimated to reduce VOCs by only 0.8 kg/day and NOx by 0.5 kg/day, the proponent should consider additional TDM measures as suggested by MassDEP in their comments on the EENF.

Historic Resources

Based on the proponent's review of MHC files, there are no known historic properties on or near the site and the South Parcel does not appear to hold any archaeological significance. In their comments on the EENF, MHC concurs with this assessment. However, the North Parcel, which is largely covered by wetlands and is undeveloped, may have archaeological significance in relation to a North American burying ground. MHC states that the North Parcel is directly adjacent to multiple archaeological sites, including the Riverside Archaeological District which is listed in the State and National Registers of Historic Places. The proponent has committed to donating this 10-acre parcel to the Friends of the Wissatinnewag (FOW) where an agreement is currently being worked out between the proponent and the FOW and the Narragansett Indian Tribe.

MHC issued a State Archaeologists Permit in December of 2006 to the Public Archaeology Laboratory, Inc (PAL) to conduct a reconnaissance archaeological survey of the 17-acre South Parcel and any additional easements required for stormwater management purposes. MHC understands that this reconnaissance survey has determined that two areas within the South Parcel contain intact soils. MHC has recommended further subsurface investigation that will be conducted by the proponent pending ground conditions suitable for archaeological testing. In response to comments from the Greenfield Historical Commission, the proponent should also consider the areas to be affected by the project's wastewater system. The Single EIR should report on the results of further investigations at the site and should provide an update on the proponent's consultation with MHC. A discussion of measures that will be implemented to avoid, minimize or mitigate any impacts to significant historic or archaeological resources should be provided.

Sustainable Development

The proponent should evaluate sustainable design alternatives that can serve to avoid or minimize potential environmental impacts. Such alternatives may also reduce project development and long-term operational costs. The Single EIR should discuss sustainable design

alternatives evaluated by the proponent and describe measures proposed to avoid and minimize environmental impacts. Such measures may include:

- Leadership in Energy and Environmental Design (LEED) certification;
- water conservation measures such as low-flow urinals and reuse of wastewater and stormwater;
- use of renewable energy;
- ecological landscaping;
- optimization of natural day lighting, passive solar gain, and natural cooling;
- an annual audit program for energy and water use, and waste generation;
- energy-efficient Heating, Ventilation and Air Conditioning (HVAC), lighting systems, and appliances, and use of solar preheating of makeup air;
- use of building supplies and materials that are non-toxic, made from recycled materials, and made with low embodied energy;
- incorporation of an easily accessible and user-friendly recycling system infrastructure into building design; and
- implementation of a solid waste minimization and recycling plan.

If a tenant for the site is known at the time of the Single EIR submission, the proponent should provide a discussion of sustainable design measures that this company has implemented at other locations.

Construction Period Impacts

The Single EIR should include a discussion of construction phasing, evaluate potential impacts associated with construction activities, and propose feasible measures to avoid or eliminate these impacts. The proponent must comply with MassDEP's Solid Waste and Air Quality Control regulations. The proponent should implement measures to alleviate dust, noise and odor nuisance conditions which may occur during the construction activities. I encourage the proponent to consider participating in MassDEP's Clean Construction Equipment Initiative consisting of an engine retrofit program and/or use of low sulfur fuel to reduce exposure to diesel exhaust fumes and particulate emissions during construction.

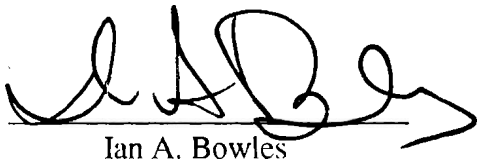
Hazardous Waste

Due to the historical use of the site as a fuel distribution facility, vehicle maintenance facility and sand and gravel mining site, the property has been impacted by numerous releases of oil and/or hazardous materials in the past. I strongly recommend that the proponent consult with MassDEP's Bureau of Waste Site Cleanup (BWSC) during the design of this project to explore what impacts, if any, the proposed project might have on these hazardous waste release sites. The proponent should ensure that the project contractors and sub-contractors maintain an emergency response plan for performing appropriate response actions in the event that contamination is encountered during project construction. The proponent should refer to MassDEP's comments regarding requirements pursuant to the Massachusetts Contingency Plan (310 CMR 40.00).

The proponent should note comments from MassDEP regarding compliance with the Underground Injection and Control Program. The proponent must consult with MassDEP regarding 310 CMR 27.00 and should report in the Single EIR on the closure of any Class V injection wells that currently discharge to the subsurface.

Mitigation

The Single EIR should contain a separate chapter on mitigation measures. It should include a Draft Section 61 Finding for all state permits that includes a clear commitment to mitigation, an estimate of the individual costs of the proposed mitigation, and the identification of the parties responsible for implementing the mitigation. The Single EIR should provide a schedule for the implementation of the mitigation, based on the construction phases of the project.



February 15, 2007
Date

Ian A. Bowles

Comments received:

Undated	Petition from the Elm Terrace Elderly Housing (45 names)
1/5/2007	Division of Fisheries and Wildlife, Natural Heritage and Endangered Species Program
1/25/2007	Christine Forgey, Mayor, City of Greenfield
1/25/2007	Verne R. Sund
1/25/2007	Edward M. Fleming
1/26/2007	Gaynelle D. & Sean M. Fiske
1/26/2007	John (last name illegible)
1/29/2007	Faith Rockwood
1/29/2007	Paula Pulaski
1/30/2007	Amy R. Harris
1/31/2007	Gaynelle D. Fiske
1/31/2007	Barbara R. Holmes
1/31/2007	Stanley K. Holmes
1/31/2007	Barbara L. Sund
1/31/2007	Gail Healy
2/2/2007	Garth Shaneyfelt
2/3/2007	Patricia Serrentino
2/4/2007	Diane Clancy
2/4/2007	Al Dray
2/5/2007	Massachusetts Historical Commission
2/5/2007	Janie M. Howard

2/5/2007	Dane L. (last name illegible)
2/5/2007	Sandra Thomas
2/5/2007	Al Norman
2/6/2007	Trout Unlimited, Deerfield/Millers Chapter
2/6/2007	Charles V. Olchowski
2/6/2007	Chris Joseph
2/6/2007	Darlene Fleming
2/6/2007	Steve Alves
2/6/2007	Haines Hydrogeologic Consulting
2/7/2007	Penny Ricketts
2/7/2007	Susan Elkin
2/7/2007	Diane & John Kanzler
2/7/2007	Deeerfield River Watershed Association
2/7/2007	Michelle Sweeney
2/7/2007	Connecticut River Watershed Council
2/7/2007	Alana J. Martineau
2/7/2007	Executive Office of Transportation
2/8/2007	Stephen H. Kaiser
2/8/2007	Greenfield Historical Commission
2/8/2007	Department of Environmental Protection, Western Regional Office
2/8/2007	Franklin Regional Council of Governments
2/12/2007	Susan D. Fiske

Form letters in support of the project: 118

IAH/BA/ba